

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**DANIEL OBREMSKI, and
TAMI OBREMSKI,**

Debtors,

**DANIEL OBREMSKI and
TAMI OBREMSKI,**

Movants,

vs.

Bankruptcy No. 21-21294-GLT

Chapter 7

Document No.

Related to Doc. No. 1

NO RESPONDENT.

**MOTION FOR ENLARGEMENT OF TIME TO FILE
SUBMISSIONS TO COMPLETE DEFICIENT FILING**

AND NOW come Daniel Obremski and Tami Obremski, by and through their Counsel, Robert O Lampl, John P. Lacher, Ryan J. Cooney, Sy O. Lampl and Alexander L. Holmquist, and file the following **MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING**, as follows:

1. The Movants are Daniel Obremski, and Tami Obremski, the Joint Debtors in this Chapter 7 Case.
2. The Movants commenced the above Chapter 7 case by filing a Petition for Relief with the Clerk of this Honorable Court on May 28, 2021.
3. At the time of the filing of the Petition for Relief, the Movants did not have available and did not provide various items of information and documents which needed to be provided by the Movants to complete their Petition. The deadline by which the Movants are to submit the items necessary for the completion of the Petition is June 11, 2021.

4. The Movants require, and respectfully request, an enlargement of the time in which they are to cure the deficiencies in their Petition.

5. Specifically, the Movants request an enlargement of time in the amount of fourteen (14) days, until June 25, 2021, to submit the materials necessary to complete their Petition.

6. The basis for the requested enlargement is that the Movants need more time to fully gather materials necessary for the completion of the petition.

7. The Movants have been diligent in gathering the materials necessary to complete their Petition but need more time to do so.

8. No prior enlargements of time have been requested in the matter.

9. No party will be prejudiced if the enlargement of time being requested herein is granted.

WHEREFORE, it is respectfully requested that this Honorable Court enter an order enlarging the time in which the Joint Debtors may cure the deficiencies in their Petition by a period of fourteen (14) days, until June 25, 2021.

Respectfully Submitted,

Date: June 11, 2021

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
RYAN J. COONEY
PA I.D. #319213
SY O. LAMPL
PA I.D. #324741
ALEXANDER L. HOLMQUIST
PA I.D. #314159
223 Fourth Avenue, 4th Fl.
Pittsburgh, PA 15222
(412) 392-0330 (phone)
(412) 392-0335 (facsimile)
Email: rlampl@lampllaw.com

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CERTIFICATE OF SERVICE

I, Robert O Lampl, hereby certify, that on the 11th day of June, 2021, a true and correct copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING** was served upon the following
(via electronic service):

Office of the U.S. Trustee
970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Date: June 11, 2021

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
RYAN J. COONEY
PA I.D. #319213
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